

REMARKS

Applicants have carefully reviewed the Application in light of the Office Action mailed February 18, 2005. At the time of the Office Action, Claims 1-55 were pending in the Application. Applicants have previously withdrawn Claims 49-55 from consideration. Applicants respectfully request reconsideration of the pending claims and favorable action in this case.

Section 102 Rejection

The Examiner rejects Claims 1-2, 4-6, 10-12, 14-15, 17-19, 23, 27-28, 34, 39-40, 44, and 46 under 35 U.S.C. §102(e), as being anticipated by U.S. Patent No. 6,603,968 B2 issued to Anvekar, et al. (hereinafter “*Anvekar*”). Applicants respectfully traverse this rejection for the following reasons. “A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. v. Union Oil Co. of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987); M.P.E.P. §2131. *Anvekar* does not disclose, teach, or suggest, either expressly or inherently, each and every element of the claims.

Applicants respectfully submit that each of the limitations of Claim 1 is not disclosed, taught, or suggested by *Anvekar*. For example, *Anvekar* does not disclose, teach, or suggest “determining a control node associated with the registration request by using an algorithm on a mobile unit identifier in the registration request” as recited in Claim 1. The Examiner suggests that *Anvekar* “inherently teaches an algorithm.” *Office Action*, p. 2. *Anvekar* only teaches an assignment of a number for local use, but does not disclose, teach, or suggest any technique for “determining a control node associated with the registration request by using an algorithm.” Because *Anvekar* fails to disclose, teach, or suggest at least this limitation, Applicants respectfully submit that *Anvekar* cannot anticipate Claim 1 under 35 U.S.C. §102(e). Thus, Applicants respectfully request reconsideration and allowance of independent Claim 1 and its dependents.

Independent Claims 14, 27, and 39 each recite certain limitations that, for reasons substantially similar to those discussed with reference to independent Claim 1, *Anvekar* does not disclose, teach, or suggest, either expressly or inherently. Therefore, Applicants

respectfully request reconsideration and allowance of independent Claims 14, 27, and 39 together with their dependents.

Section 103 Rejection

The Examiner rejects Claims 3, 16, and 29 under 35 U.S.C. §103(a), as being unpatentable over *Anvekar* in view of U.S. Patent No. 6,728,237 B2 issued to Helander (hereinafter “*Helander*”). The Examiner rejects Claims 7, 20, and 41-42 under 35 U.S.C. §103(a), as being unpatentable over *Anvekar* in view of U.S. Patent No. 6,014,558 issued to Thomas (hereinafter “*Thomas*”). The Examiner rejects Claims 9, 22, and 33 under 35 U.S.C. §103(a), as being unpatentable over *Anvekar* in view of U.S. Publication No. 2003/0053430 A1 issued to Choi et al. (hereinafter “*Choi*”). The Examiner rejects Claims 13, 26, and 37 under 35 U.S.C. §103(a), as being unpatentable over *Anvekar* in view of U.S. Patent No. 6,041,358 issued to Huang et al. (hereinafter “*Huang*”). The Examiner rejects Claims 24, 35, and 45 under 35 U.S.C. §103(a), as being unpatentable over *Anvekar* in view of U.S. Patent No. 6,728,300 B1 issued to Sarkar et al. (hereinafter “*Sarkar*”). The Examiner rejects Claims 25 and 36 under 35 U.S.C. §103(a), as being unpatentable over *Anvekar* in view of *Sarkar* and further in view of *Thomas*. The Examiner rejects Claim 47 under 35 U.S.C. §103(a), as being unpatentable over *Anvekar* in view of U.S. Patent No. 4,926,495 issued to Comroe et al. (hereinafter “*Comroe*”). The Examiner rejects Claim 48 under 35 U.S.C. §103(a), as being unpatentable over *Anvekar* in view of *Comroe* and further in view of U.S. Patent No. 6,385,204 issued to Hoefelmeyer et al. (hereinafter “*Hoefelmeyer*”). Applicants respectfully traverse these rejections for the following reasons.

Applicants respectfully submit that the combinations as recited above fail to disclose, teach, or suggest each limitation recited in Applicants’ Claims 3, 7, 9, 13, 16, 20, 22, 24-26, 29, 33, 35-37, 41-42, 45, and 47-48. The above-mentioned claims are dependent claims that include limitations of their respective independent claims, which have been shown to be allowable, and add additional elements that further distinguish the combinations. The combinations as recited do not disclose, teach, or suggest the limitations recited in Claims 3, 7, 9, 13, 16, 20, 22, 24-26, 29, 33, 35-37, 41-42, 45, and 47-48. Accordingly, Applicants respectfully request reconsideration and allowance of these claims.

Allowable Subject Matter

Applicants note with appreciation the Examiner's allowance of Claims 8, 21, 30-32, and 43. The Examiner indicates that the subject matter of these claims would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. *Office Action*, p. 12. As discussed above, Applicants believe that independent Claim 1 (from which Claim 8 depends), independent Claim 14 (from which Claim 21 depends), independent Claim 27 (from which Claims 30-32 depend), and independent Claim 39 (from which Claim 43 depends) are allowable in their current form. Accordingly, Applicants believe that Claims 8, 21, 30-32, and 43 are also allowable in their current form. Applicants respectfully request reconsideration and allowance of Claims 8, 21, 30-32, and 43.

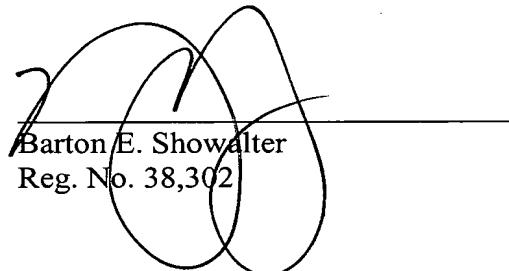
CONCLUSION

Applicants have now made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for all other reasons clear and apparent, Applicants respectfully requests reconsideration and allowance of the pending claims.

Applicants believe that no fee is due. If, however, this is not correct, the Commissioner is hereby authorized to charge any amount required or credit any overpayment to Deposit Account No. 02-0384 of BAKER BOTTs L.L.P.

If there are matters that can be discussed by telephone to advance prosecution of this application, Applicant invites the Examiner to contact its attorney, Barton E. Showalter, at (214) 953-6509.

Respectfully submitted,
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